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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91215387
Party	Defendant Melton, Naomi R., Melton, Chelsea, R, Melton, Adelaide, R
Correspondence Address	MELTON, NAOMI R. MELTON, NAOMI R. 5814 KNOLLWOOD TRL SPRING, TX 77373-4985  meltonnaomi@ymail.com
Submission	Motion to Amend/Amended Answer or Counterclaim
Filer's Name	Adelaide S. Melton
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Signature	/Adelaide S Melton/
Date	04/18/2014
Attachments	Answer to Opposition #91215387.pdf(277282 bytes )

April 17, 2014

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the matter of trademark application Serial No. 91215387

For the mark: #IDOTHIS Life in Action

Published in the Official Gazette on: November 12, 2013

NIKE, INC.,

V.

Melton, Naomi R.

Melton, Chelsea R

Melton, Adelaide, S.,

ANSWER TO NOTICE OF OPPOSITION

Nike, Inc.  
Helen Hill Minsker, Attorney  
Banner & Witcoff, Ltd.  
10 South Wacker Drive Suite 3000  
Chicago, IL 60606

The above-identified opposer believes that it/he/she will be damaged by registration of the mark shown in the above-identified application, As to each of the allegations contained in the complaint, that all allegations are denied. Applicants and/or Defendants were not aware of the Design Mark "Jump Man" which is used for goods/services U.S. Registration No. 3428287 by NIKE, INC. such as; Footwear and Clothing, namely Pants, Shorts, Shirts, T-Shirts etc...

We would like to propose an Amendment to "IDOTHIS Life in Action" by removing the said "Upside Down Break Dancer" which is located in the center of the spiral to limit the likelihood of confusion with the NIKE, Inc. and/or "JUMP MAN" Design and replace it with Naomi R. Melton and Chelsea R. Melton's (Defendants) personal photo of themselves if agreed upon to move forward with the Trademark Application.

  
Adelaide S. Melton, Defendant

  
Naomi R. Melton, Defendant

  
Chelsea R. Melton, Defendant